Summary of Attachments

1. Central Office Code (NXX) Assignment Guidelines
2. ICCF Report on Rating and Routing In A Local Environment
3. INC Initial Report to the North American Numbering Council(NANC) on Number Pooling
4. Pennsylvania PUC Docket No. P-00961027,61,71
5. Rate Center Consolidation Issue Matrix
6. North American Numbering Council Architecture & Administrative Plan for Local Number Portability
7. SW Region Position Paper-Location Portability Scope
8. INC Status Report on Issue 105- Number Pooling
9. Inconsistent Rate Center Description
10. Illinois Number Portability Workshop-Report on Number Pooling
11. Number Pooling Management group- Report on Results of September 15 Meeting- NANC
12. October 7, 1997 letter from Illinois Number Pooling group to Richard Metzger, Acting Chief, Common Carrier Bureau, FCC
13. NPA Exhaust Projections Worksheets—Lockheed/Martin model
14. FCC Public Notice-Comments on Petition for Declaratory Ruling and Request for Expedited Action By Providers of CMRS in Pennsylvania
15. GTE Contribution—Rationale of a Rate Center ID Number(RCID)
16. Summary of Number Utilization from Data Request
17. NXX Assignment History for NPAs 214/972/713/281/512
18. Georgia PUC Order for Relief in Atlanta Area
19. Colorado PUC Order for Relief in Denver Area
20. Jeopardy Summary—972-713-281

I.

Mission Statement

On September 11, 1997, the Public Utility Commission of Texas created and empowered the Texas Number Conservation (TNC) Task Force to:

> "identify, evaluate, and recommend number conservation measures for implementation in Texas that will facilitate an uninterrupted supply of telephone numbers for telecommunications customers while minimizing the need for new NPAs within the state."

The TNC was asked to review number conservation alternatives for the state of Texas that might extend the life of NPAs 214/972 (Dallas), 713/281 (Houston), and 512 (Austin/Corpus Christi). Each of these NPAs are currently under NPA relief planning in Projects 16889, 16900 and 16901.

The TNC was also asked to recommend a "long term" number conservation solution for implementation throughout the state of Texas.

This report is broken into seven separate sections each detailing a particular portion of the TNC's activities over the past three months. This report takes advantage of number conservation activities taking part in virtually every region of the country. Efforts currently underway in Illinois, Colorado, Minnesota, Missouri, Pennsylvania, etc., as well as activities of the Industry Numbering Committee and the North American Numbering Council (NANC) were considered during the TNC evaluation process. Attached to this report will be pertinent documents used during our analysis. Rather than reword previous efforts, these resource documents are attached for thorough, in context review.

II.

Summary of Participating Companies/Entities

The following is a list of companies/entities that participated in the TNC efforts.

A total of 9 "in-person" meetings were held in Austin and Dallas to discuss the number conservation issue. In addition, weekly conference calls were held since September to facilitate the creation of the TNC report and recommendations.

City of Plano
Ed Jones-Private citizen
Kingsgate Telephone, Inc.
Golden Harbor
AT&T
MCI
Fort Bend Telephone Company
Eric Drummond/BHS
AllTel

LCTX
Aerial
GTE

PCS Primeco
Sprint
Sprint PCS
AT&T Wireless
PUCT Staff
Lockheed-Martin
TSTCI
Time Warner
360 Communications
GTE Wireless
Cathey, Hutton & Assoc.
SWBT

It is worth noting that a significant number of interested parties participated in the TNC activities; however numerous telecommunications companies as well as citizens, consumer groups , political bodies, etc. that may be effected or may have wanted to participate were not involved in any of the TNC efforts and, as such, did not contribute to this report.

III.

CONSERVATION METHODS CONSIDERED
DESCRIPTIONS

A. Rate Center Consolidation

Description

A "rate center" is a specific geographic location ,(identified by vertical and horizontal coordinates) associated with a telephone company's central office (CO) switch, used to calculate mileage for inter and intra LATA toll billing and intercompany settlement purposes. The rate center is also used to provide specific customer information regarding the call--a description of the location being called. One or more CO's may be a part of the same rate center. RC's have traditionally been associated with the Incumbent Local Exchange Carrier (ILEC) serving areas and are approved by the PUCT.

Competitive Local Exchange Carriers (CLECs) are likely to provide service using a network infrastructure which is not a mirror image of the ILEC infrastructure. Specifically, the area served by a CLEC switch is likely to be much larger than that of the ILEC and may/will cover a multitude of existing rate centers. (Consequently, a CLEC might satisfy the demand for its services with numbering resources from a few (possibly one) NXXs (e.g. 512-221) for an ILEC Rate Center while an ILEC may have multiple NXXs assigned to COs within the same Rate Center.) The requirement for the CLEC to have one NXX per rate center is necessary if the CLEC is to perform call rating/billing consistent with the ILEC. This arrangement assumes the CLEC and the ILEC Rate Center structure is "consistent"—the geography covered by CLEC and ILEC rate centers is identical in a consistent rate center structure.

An alternative Rate Center arrangement, referred to as "inconsistent rate centers" (IRC) also exists. A description of the inconsistent rate center structure follows:

An "inconsistent rate center" exists when, for the serving area of a competing telephone company, the rate center assignment does not match the rate center assignment of the ILEC. Typically, IRCs involve competing telephone companies having RCs with a larger geographic area represented by the V&H coordinates of the ILEC rate center. The existing IRCs, and those considered by the TNC are Commission approved arrangements. These rate center structures are used, by those CLECs who choose it, in the same manner and for the same purposes as the ILEC rate centers. The Commission in Texas has previously approved at least three inconsistent rate center structures for CLECs—Golden Harbor of Texas, Inc., Kingsgate and American Telco. This was done in order to conserve NXX codes since the CLEC did not require a separate NXX per ILEC rate center in order to serve its customers and did not desire to mirror the ILECs existing rate center structure. A basic characteristic of an inconsistent rate centers presumes that calling within the inconsistent rate centers area, between the ILEC and the CLEC using the IRC, will be rated as local. This requires specific provisions in the carrier's interconnection agreements and/or TPUC action.

Call rating/billing is typically effected by downstream processes supported by each service provider. These processes rely upon knowledge of the calling and called party locations to determine if the call is local or toll, and to compute the specific charge for the call. The calling and called party locations are associated with the NPA-NXX of calling and called party numbers and are listed in industry documents maintained by the Traffic Routing Administration (TRA) within Bellcore.

The practice of assigning an NXX code per provider, per ILEC rate center, per CO, is allowable under the *CO Code (NXX) Assignment Guidelines* (Attachment 1) and consistent with regulatory requirements in Texas. In a competitive marketplace, this ILEC assignment practice creates NXX demand greater than necessary to serve customers growth. This increased demand ultimately results in an accelerated exhaust of the NPA serving the area.

To the extent the number of Rate Centers in an NPA for which CLECs must have an NXX can be reduced, the requirement of CLECs for NXXs may also be reduced. The specific time required for implementation of a modified rate center structure will be dependent upon the complexity of the existing rate center structure and the extent of changes made to that structure and associated network elements to accommodate RCC or inconsistent rate centers.

The Commission can, through rate center consolidation or inconsistent rate centers, reduce the number of new NXXs necessary for new entrants to mirror ILEC rate centers, thus reducing the demand on NXX codes (number blocks). However, as long as any ILEC(s) continue to request codes or blocks of numbers on a rate center basis, it is possible that new entrants will choose to mirror the ILEC's NXX arrangement. Even after Local Number Portability is implemented, both ILECs and CLECs may determine that where there are multiple switches per rate center, it is desirable to have number blocks assigned per CO within a Rate Center.

Except as noted in the various options, the benefits of RCC or inconsistent rate centers are primarily realized in reduced future NXX demand. It is important to note that when a Rate Center is consolidated, assigned NXX codes are not returned to the Code Administrator. Assuming all NXX codes assigned to telecommunications providers have assigned and working customers within the code, the only way for NXXs to be returned to the Code Administrator for assignment to another provider would be for working numbers within the NXX to undergo a 7D number change, thus freeing up all 10,000 numbers within the NXX It is possible that some carriers may have a small number of recently assigned NXXs in which no telephone numbers have yet been assigned. It is possible these NXXs could be returned by the code holder to the Code Administrator. (This situation, while possible, seems unlikely to exist in most cases.)

Attachment 2, the *ICCF Report on Rating and Routing in a Competitive Local Environment* provides additional explanation and industry study on both consistent and inconsistent rate center consolidation models.

The following is a breakdown of incumbent Rate Centers in each of the areas currently analyzed by the TNC.

NOTE: The review of the 512 NPA focused on rate centers within the Austin metro area.

Area	Current Rate Center's
Dallas	63
Houston	55
Austin	27

B. Number Pooling

Description

Although not completely defined by the industry, number pooling is a concept where numbers are no longer allocated to individual industry participants in blocks of 10,000 (known as central office codes or NXXs), but are allocated between multiple industry participants in some quantity less than 10,000.

The industry-accepted definition for number pooling is:

> "Pooling of geographic numbers in a local number portability environment is a number administration and assignment process which allocates numbering resources to a shared reservoir associated with a designated geographic area."

The Industry Numbering Committee, (INC), at the direction of the North American Numbering Council (NANC) is currently considering a number of pooling alternatives, all of which require long-term Local Number Portability using Location Routing Number (LRN LNP) to maintain call routing and billing capabilities. Only LRN LNP capable service providers will be capable of participate in Number Pooling. Number Pooling will require a Number Pool Administrator (a separate activity as compared to the Central Office Code Administrator) who will manage the Industry Inventory (pool) for all pooling participants. The Number Pooling Administrator will follow national guidelines which will ensure neutral administration across the North American Numbering Plan. Attachment 3 is a copy of the Industry Numbering Committee (INC) *Initial Report to the North American Numbering Council (NANC) on Number Pooling.*

Service providers will have the ability to maintain a supply of unassigned telephone numbers in a Service Provider Inventory for subsequent assignment to subscribers. As the Service Provider Inventory depletes, the service provider would request additional numbering resources from the Industry Inventory. The Pooling Administrator would likely be required to validate the need of each service provider before providing any number resources.

The TNC focused its efforts on 1000 block pooling. Many in the telecommunications industry feel individual Telephone Number (TN) pooling is the long term goal. However, at this time 1000 block pooling appears to offer the highest probability of implementation in the shortest timeframe.

1000 Block Pooling

Thousand Block Pooling (or NXX-X LRN Number Pooling) allocates 1000 consecutive numbers (000-999) within an NXX to service providers that are providing service within a rate center. This would allow up to ten (10) service providers to be allocated unassigned telephone numbers within the same NXX. The Pooling Administrator would be required to manage the assignment of number resources according to NXX-X .

OUTSTANDING ISSUES

Pre-port Versus Port-on-demand

This issue addresses when the pooled telephone number should be placed into the Number Portability Administration Center (NPAC) database, or Regional Service Management System (RSMS). Pre-port requires all numbers be placed in the NPAC upon allocation to a service provider (although not assigned to a customer). Port on demand requires the telephone number to be placed in the RSMS once assigned to a customer.

The implications of pre-port vs. port on demand on the provisioning, systems and database capacity are still under evaluation. A analysis of these two pooling options is currently being aggressively pursued by the INC.

Utilization of Embedded Numbers for Establishment of Pool

The Industry Inventory requires telephone number resources in order to allocate them to service providers. This issue addresses whether to utilize "growth" numbers (number resources which have not been allocated to any service provider by the Central Office Code Administrator) versus utilizing "embedded" numbers (number resources which have been allocated to a service provider by the CO Code Administrator). If it is determined that embedded numbers will be utilized, an additional issue is raised regarding what the criteria will be to determine which embedded numbers will be used.

Snapback

Currently disconnected ported telephone numbers "snapback" to the service provider identified in the Local Exchange Routing Guide (LERG) as the default carrier. Once Number Pooling is established, there is a question whether the existing snapback policy should be

reconsidered. Alternatives include snapping back to the NXX code holder (default carrier), snapping back to the 1000 block code holder (for 1000 block pooling), or not snapping back at all (remains with the disconnecting service provider for re-assignment/vacant number treatment).

National Pooling Architecture

The architecture and process flows that will be developed will be greatly impacted depending on which Number Pooling alternative is chosen. The details will also include what information is necessary in Service Provider Pools and the Industry Pool for the Pooling Administrator to perform their management activities, including an audit process.

Assignment Guidelines/Requirements

If Number Pooling is implemented within the state of Texas prior to a national Pooling Administrator(s) being chosen, a decision as to an interim PA will be required. An associated issue will be "who will pay the Pool Administrator?"

Once the pooling alternative is developed, extensive guidelines must be developed. Much detail is required to establish the responsibilities of the new Pooling Administrator and how that administrator will interact with the NANPA/CO Code Administrator and the NPAC. Those responsibilities will be developed into a requirements document which will be utilized to make a recommendation regarding the selection of the Number Pooling Administrator.

C. Transparent Overlay

Description

Among methods considered, but not recommended is the following:

Most notable is the "Transparent Overlay", which has gained attention primarily due to regulatory and industry action in Pennsylvania. The following is from a Pennsylvania PUC order entered July 15, 1997: (Attachment 4)

> "The proposal is use of a temporary, transparent and fictitious new NPA (area code) for any new NPA-NXX needed. It would be reached by Remote Call Forwarding (RCF). The first three digits of the NPA-NXX would be from an area code that is not in public use. The number given to the customer would be from an existing NXX but calls to that number will in fact be switched to the switch with the transparent or "virtual" NPA-NXX and routed from there. Since numbers from the virtual NPA would not be given out, this would not require use of any existing NXXs.
>
> If a customer wants to add new service and the provider does not have an NXX in that rate center, a LEC will be required to provide the number and use RCF to transfer calls to the transparent number switch. As with the long term solutions, the NPA-NXX must be in the same rate center. Some services may be unavailable and others may be of lower than standard quality, although this should be minimized. These parties indicate that upon implementation of LNP, the NPA-NXX transparent NPA would be released."

It is important to understand that implementation of a transparent overlay is *not* a number conservation mechanism, and is *not* designed to extend the life of an NPA. Rather, it provides a means ,in a pre LNP enviornment, by which a new service provider can begin to provide service in an area where NXX shortages prevent it from obtaining an NXX to serve a new customer in a given rate center.

D. Other Number Conservation Methods

Description

- Unassigned Number Pooling (INP) - This solution, using Route Index INP technology (a single number solution), would only be viable for a short-term application, due to the general disadvantages of INP. No additional NPA (e.g., PA Transparent Overlay) would be required. Vacant line numbers could be ported, providing an immediate reduction in the need to add NXXs (assuming enough vacant numbers were available to satisfy new customer orders). However, due to the above stated disadvantages, this method is not seriously considered for use in Texas.

- Expanded NPA Overlay - This method was not supported due to complications similar to IRC, but with a larger geographic implication.

- Extended Local Calling Area - This method was not supported due to limited application available (CMRS only).

- Sequential Number Assignment - Already ordered by the PUC, this method should be maintained in anticipation of the benefits of Thousands Block Number Pooling. A 5% contamination factor (50 numbers per 1,000) should be allowed to enable sale of vanity numbers by the NXX holder. These numbers would be ported upon deployment of Thousands Block Number Pooling. Any party being certified for local or wireless service, plus, any party receiving an NXX from the COC Administrator should be reminded of the PUC order in this regard to allow for greater compliance.

- Unassigned Number Pooling (LRN) - This method, basically NXX-X/LRN at the line number level, is not well developed, nor advocated in any state or national forum currently. Future developments will be monitored for application in Texas.

E. Test Codes, Special Codes and Protected Codes

Within every NPA, a varying supply of NXXs are not available for assignment to telecommunications providers. These codes are used for plant test purposes—testing of the various communications providers networks, codes reserved for some future use, or special codes that are assigned consistently on a national level, i.e. Time and Temperature, 411, 911, etc. To the extent this quantity of codes can be minimized, more telephone numbers are available for customer use.

The following is a summary of all codes that currently fall into this unavailable category. In addition, the use of each code is provided.

PROTECTED

214	433	EAS-ANNA-VAN ALSTYNE-IK. WORKING IN 903
214	440	EMS AUBREY-PROSPER/FRISCO
214	482	EAS ANNA-VAN ALSTYNE-IK

RESERVED

214	214	HOME NPA
214	285	RESERVED FOR WORKING ALARM COMPANY
214	383	RESERVED FOR WORKING ALARM COMPANY
214	430	ADJACENT NPA RELIEF (903)
214	469	214 NPA RELIEF CODE #1
214	817	ADJACENT NPA
214	846	214 NPA RELIEF CODE #2
214	903	ADJACENT NPA
214	940	ADJACENT NPA RELIEF (817 #1)
214	945	ADJACENT NPA RELIEF (972 #1)

SPECIAL

214	211	
214	311	
214	411	LOCAL DIRECTORY ASSISTANCE
214	511	
214	555	TOLL DIRECTORY ASSISTANCE
214	610	SPL XLTNS-CHOKE NTWK
214	611	
214	700	INDUSTRY INTRA-LATA PIC VERIFICATION CODE
214	703	SPIDS - SPECIAL PREFIX INFO DELIVERY SVC
214	711	
214	787	DALLAS METRO CHOKE NETWORK
214	811	
214	844	TIME & TEMPERATURE
214	911	NATIONAL EMERGENCY ACCESS
214	936	WEATHER SERVICE
214	950	FGB ACCESS CODE
214	976	BELLCORE INFO DELIVERY SVC

PROTECTED

972	433	EAS-ANNA/VAN ALSTTNE, IK
972	440	EMS-AUBREY/PROSPER/FRISCO
972	482	EAS ANNA/VAN ALSTYNE-IK

RESERVED

972	214	ADJACENT NPA
972	430	ADJACENT NPA RELIEF (903)
972	469	ADJACENT NPA RELIEF (214)
972	737	972 NPA RELIEF CODE #2
972	817	ADJACENT NPA
972	903	ADJACENT NPA
972	940	ADJACENT NPA RELIEF (817 #1)
972	945	972 NPA RELIEF CODE #1
972	972	HOME NPA

SPECIAL

972	211	
972	311	
972	411	LOCAL DIRECTORY ASSISTANCE
972	511	
972	555	TOLL DIRECTORY ASSISTANCE
972	610	SPL XLTNS-CHOKE NTWK
972	611	
972	700	INDUSTRY INTRA-LATA PIC VERIFICATION CODE
972	703	SPIDS - SPECIAL PREFIX INFO DELIVERY SVC
972	711	
972	787	DALLAS METRO CHOKE NETWORK
972	811	
972	844	TIME & TEMPERATURE
972	911	NATIONAL EMERGENCY ACCESS
972	936	WEATHER SERVICE
972	950	FGB ACCESS CODE
972	976	BELLCORE INFO DELIVERY SVC

PLANT TEST

972	955	LOAD BOX TRK TEST MILLIWATT
972	958	BELLCORE AUTHORIZED PLANT TEST CODE
972	959	BELLCORE AUTHORIZED PLANT TEST CODE

972	970	PLANT TEST 10-DIG ANAC
972	971	STATION RINGER TEST
972	973	STATION RINGER TEST
972	974	STATION RINGER TEST

PROTECTED

713	372	PROTECT FOR WALLER, TX (409 EMS)
713	384	UNASSIGNABLE

RESERVED

713	389	RESERVED PER PUC ORDER
713	713	HOME NPA
713	832	ADJACENT NPA RELIEF (281 #2)
713	848	713 NPA RELIEF CODE #2
713	936	ADJACENT NPA RELIEF (409 #2)

SPECIAL

713	211	
713	311	
713	390	CHOKE NETWORK
713	411	LOCAL DIRECTORY ASSISTANCE
713	511	
713	555	TOLL DIRECTORY ASSISTANCE
713	611	
713	700	INDUSTRY INTRA-LATA PIC VERIFICATION CODE
713	711	
713	766	SPIDS - SPECIAL PREFIX INFO DELIVERY SVC (PRESCOTT)
713	811	
713	889	CHOKE NETWORK (1ESS)
713	911	NATIONAL EMERGENCY ACCESS
713	950	FGB ACCESS CODE
713	976	BELLCORE INFO DELIVERY SVC

PLANT TEST

713	231	STATION RINGER
713	234	STATION RINGER - ANAC FOR ANI CKT
713	258	STATION RINGER (281 NPA RELIEF CODE #1)
713	281	CAROT TEST (ADJACENT NPA)
713	322	DALCOM TRUNK
713	325	BAT GD. REM
713	352	TENNECO TESTING
713	380	AUTO NUMB ANN
713	381	PLANT TEST CODE (GTE SOUTHWEST)
713	489	TEMP TEST FOR LNP
713	573	TEMP TEST FOR LNP
713	[illegible]	TEMP TEST FOR LNP

PROTECTED

512	839	EAS - SMITHVILLE/ROCKYCREEK

RESERVED

512	210	ADJACENT NPA
512	214	ADJACENT NPA
512	254	ADJACENT NPA RELIEF (817 #2)
512	361	512 NPA RELIEF CODE #2
512	382	RESERVED FOR NEW LOCAL EXCHANGE SVC.
512	409	ADJACENT NPA
512	512	HOME NPA
512	713	ADJACENT NPA
512	809	ADJACENT NPA (CARIBBEAN - PUERTO RICO)
512	817	ADJACENT NPA
512	915	ADNACENT NPA
512	979	ADJACENT NPA RELIEF (409 #1)

SPECIAL

512	201	NETWORK MGMT SPECIAL ROUTING CODE
512	211	
512	311	
512	390	AUSTIN CHOKE NETWORK
512	411	LOCAL DIRECTORY ASSISTANCE
512	511	
512	555	TOLL DIRECTORY ASSISTANCE
512	611	
512	700	INDUSTRY INTRA-LATA PIC VERIFICATION CODE
512	711	
512	766	SPIDS - SPECIAL INFO DELIVERY SVC
512	770	CHOKE NETWORK (CORPUS CHRISTI)
512	811	
512	911	NATIONAL EMERGENCY ACCESS
512	950	FGB ACCESS CODE
512	973	TIME & TEMPERATURE
512	975	ESS INWATS
512	976	BELLCORE INFO DELIVERY SVC

IV.

Analysis of Conservation Methods

A. Rate Center Consolidation

The following section is comprised of nine scenarios (1-6 for Rate Center Consolidation, 7-9 for Inconsistent Rate Centers) that have been evaluated for their impact on Number Conservation, and the customers and carriers involved.

Attachment 5 provides a summarized matrix of all nine consolidation options.

Option No. 1

Consolidate rate centers in the metropolitan exchanges within the ILECs existing local exchange boundary, **without affecting** local exchange calling scopes (proposal does not consolidate zones in the local exchange area with unique calling arrangements due to EMS, EACS, etc.).

# of Rate Centers Consolidated	**Dls 19 : 5** **Aus 15 : 2** **Hou 25 :16** **SWBT only**
ISSUES Associated with Proposal	

1. Update TPM (Industry Document with Rate Center & V/H required

2. OSS Update Requirements to reflect Rate Center Change i.e. TPM, Operator Tables

3. Implementation Estimated in 3-6 Months from Approval of Compliance Filing--ILEC schedule. CLEC could be shorter

4 .Rate Center Name Change--Billing records reflect new name

5. Impact To Texas Pooling Alternative Settlement Practice (The Toll Pool)

6. Customer Toll Charges Impacted

7. Golden Harbor will require the following add'l NXXs: Dallas: 214 - 0; 972 +4 Austin: 512 +1 Houston : 713 - 0; 281 +22

NOTE: These additional NXX requirements will be necessary if Golden Harbor must match this rate center structure.

8-9. The maximum # of initial NXXs to match the ILEC RC structure is as follows (customer demand may necessitate add'd NXXs)

Dallas:	19 RCs to 5	
Austin:	15 RCs to 2	(All locations are SWBT RCs)
Houston :	25 RCs to 16	

10. No Mechanism to recover the cost of RCC Implementation.

11. ILECs do not expect to return any NXX codes as a result of RCC. Assumed: No forced # changes; Present NXXs are for current/future demand; presently cannot share NXXs between CO Switches.

12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe for this consolidation, it is likely that MCI will have begun serving customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation, MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Does not affect local calling scopes.

14. Does not impact rate groups or local rates.

15. The rating of local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll changes gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (Private Line & Local)

17. SWB 911 Routing, Provisioning & Database not Affected Minor Affect - Potential Increase to Existing Problems with Default Routing.

Option No. 2

Consolidate rate centers in the metropolitan exchanges within the ILECs existing local exchange boundary, affecting local exchange calling scopes. (Proposal consolidates all zones within the local exchange area including zones with unique calling arrangements due to EMS, EACS, etc.-ONE rate center per exchange).

# of Rate Centers Consolidated	Dls 19:2 Aus 15:1 Hous 25:2 SWBT only

ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H)

2. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables

3. Implementation Estimated in 6-9 Months from Approval of Compliance Filing

4. Rate Center Name Change

5. Impact To Texas Pooling Alternative Settlement Practice

6. Magnitude of Customer Toll Changes may be Greater than Option 1.

7. Golden Harbor will return the following quantity of NXXs:

Dallas:	214 - 0;	972 -1
Austin:	512 - 0	
Houston :	713 - 0;	281 -1

8-9. If a CLEC enters NPA they would require: (i.e. the maximum # of NXXs to cover the entire RC) will reduce from 19 to 2 in Dallas)

Dallas:	19 RCs to 2
Austin:	15 RCs to 1
Houston :	25 RCs to 2

10. No mechanism to recover the cost of RCC Implementation

11. ILECs do not expect to return any NXX codes as a result of RCC; no forced # changes; growth demand; presently cannot share NXXs between CO Switches.

12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe for this consolidation, it is likely that MCI will have begun serving

customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation, MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Does affect local calling scopes

14. Depends on decisions regarding expansion of local calling scopes

15. The rating of local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (Private Line & Local) Interconnection Agreements brought into compliance with ordered plan.
Expect Contested Case.

17. EAS,EMS,ELC impact. can allow "local" calling to calling scope in excess of that originally planned
Lost Toll - Possible Solutions:
1) Grandfather - No port out of ILEC WC
(Port In ILEC may req NXX)
2) Eliminate EAS/EMS/ELC
3) Expand Calling Scope for EAS Exchange

18. IXC Revenue & ILEC Access Payments will be +/ - affected, depending whether local EAS scope remains or eliminated..

19. CMRS - Grand Prairie does have toll-free dialing access to all of Metro Ft Worth: therefore, RCC including Gr Prairie will open all the exchanges in the new rate center to CMRS toll free dialing from Ft Worth - Other similar arrangements may exist for CMRS

20. SWB 911 Routing, Provisioning & Database not Affected
Minor Affect - Potential Increase to Existing Problems with Default Routing

<u>Option No. 3</u>

Consolidate, with each other, contiguous rate centers of a single ILEC with common calling scopes, without regard to exchange boundaries. (Does not change calling scope).

# of rate Centers Consolidated	Dallas 8:2 GTE Austin N/C Houston 6:4 (GTE) 4:2 (Sprint)x

ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H.

2. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables

3. Implementation Estimated in 6-9 Months from Approval of Compliance Filing

4. Rate Center Name Change

5. Impact To Texas Pooling Alternative Settlement Practice

6. Customer Toll Changes Impact will be + or -.

7. Golden Harbor will return the following NXXs:

Dallas:	214 - 0;	972 -5
Austin:	512 - 0	
Houston :	713 - 0;	281 -2

8-9. If a CLEC enters NPA they would require: (i.e. the maximum # of NXXs to cover the GTE RC) will reduce from 8 to 2 in Dallas.

Dallas:	8 RCs to 2 (GTE)
Austin:	0 RCs
Houston :	6 RCs to 4 (GTE); 4 RCs to 2 (Sprint

10. No mechanism to recover cost of RCC Implementation

11. ILECs do not expect to return any NXX codes as a result of RCC; : no forced # changes; growth demand; presently cannot share NXXs between CO Switches

12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe for this consolidation, it is likely that MCI will have begun serving customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation,

MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Although the calling scope is the same within each existing rate center, the charge for basic local service may not be the same after the change. This is because the local rate is a two part rate based on the number of customers in the exchange plus a mandatory EAS rate based on the size of the calling scope. While the EAS rate would not change the rate based on exchange size would. This option, if implemented, would require some change in basic rates and therefore require Commission approval.

14. Can increase rate group size & associated rates in accordance with existing tariffs.

15. The rating of local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. Rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (PL & Local) Interconnection Agreements brought into compliance with ordered plan.

17. CMRS Land to mobile calls will continue to be rated as before as long as the consolidated rate centers all share the same calling scope.

18. Dallas 911 Constrained - Not provisioned by common 911 Database Mgt ; nor common Selective Router System Implications to other Agencies besides PUC for Eqpt ; Trnks Contract & Database - Optimal RCC may not be reached. Can be Corrected within 6-9 mo timeframe.

Option No. 4

Consolidate with each other the rate centers of non-metro exchanges of a single ILEC that currently have mandatory expanded calling scopes into the metropolitan exchange.

# of NXXs Rate Centers Consolidated	Dis 8:1GTE 2:1 SWBT Aus N/C Hous 2:1 GTE 4:1 Sprint

ISSUES Associated with Proposal

1. Update TPM (Industry Document with Rate Center & V/H.

2. OSS Update Reqts to reflect Rate Center Change i.e. TPM, Operator Tables

3. Implementation Estimated in 6-9 Months from Approval of Compliance Filing

4. Rate Center Name Change

5. Impact To Texas Pooling Alternative Settlement Practice

6. Magnitude of Customer Toll Changes may be Greater than Option 3.

7. Golden Harbor will return NXXs as follows:

Dallas:	214 - 0;	972 -5
Austin:	512 - 0	
Houston :	713 - 0;	281 -3

8-9. If a CLEC enters NPA they would require: (i.e. the maximum # of NXXs to cover the RC) will reduce from 10 to 2 in Dallas;
Dallas: 8 RCs to 1(GTE) and 2 to 1(SWBT)
Austin: N/C
Houston 2 RCs to 1 (GTE); 4 RCs to 1 (Sprint)

10. No mechanism to recover cost of RCC Implementation

11. ILECs do not expect to return any NXX codes as a result of RCC: no forced # changes; growth demand; presently cannot share NXXs between CO Switches

12. MCI would return any NXX codes in which no numbers had been assigned at the time the consolidation is implemented. However, based on MCI's marketing plans, and the TNC estimates of implementation timeframe for this consolidation, it is likely that MCI will have begun serving customers with most, if not all, of the NXXs allocated to MCI by that time. Thus, MCI would have few if any entire NXXs to return. However, given the current practice of sequential number assignment, if 1000 block number pooling were simultaneously implemented with the consolidation, MCI could potentially have a significant number of unassigned 1000 blocks to return to the pool once the consolidation and pooling is implemented.

13. Does affect local calling scopes This option has the same issues as option three for GTE. In addition, it would require the restructuring of Expanded Metro Dialing to Ft Worth from the exchanges of Lewisville, Irving, and DFW or require this option be offered to Carrollton, Plano, Rowlett, Wylie, and Garland. In other companies this may result in an expansion of the local calling scope. This option, if implemented, would require some change in basic rates and therefore require commission approval.

14. Does impact rate group size & associated rates in accordance with existing tariffs. Access revenues effected

15. The rating of local area calls does not change. Toll call charges for interexchange and private line services (mileage sens. rates) from outside the consolidated rate centers will change + or - or not at all. As rate center expands, the effect of toll change gets bigger.

16. Procedural Requirements - Tariff Filing req'd, (Private Line & Local) Interconnection Agreements brought into compliance with ordered plan.
Expect Contested Case.

17. EAS,EMS,ELC arrangements that allows "local" calling to calling scope in excess of that originally planned. In areas within the RCC, point to point IntraLATA toll is eliminated. Also, "islands" of EAS/EMS calling arrangements exist with certain areas within the RCC.

18. IXC Revenue & ILEC access payments will be +/ - affected, depending whether local EAS scope remains or is eliminated. While RCC eliminates toll calling., IntraLATA Toll revenues for all providers (ILECs& IXCs) is reduced. As a result, access revenues for toll will also decrease. Reduction to revenues may prompt Local Rate Increase Requests.

19. CMRS - Grand Prairie does have toll-free dialing access to all of Metro Ft Worth: therefore, RCC including Gr Prairie will open all the exchanges in the new rate center to CMRS toll free dialing from Ft Worth. Other Similar Arrangements May exist for CMRS.